



# COLORADO

## Broadband Office

Governor's Office of Information Technology

Tony Neal-Graves, Executive Director  
250 East 18th Avenue, Suite 130  
Denver, CO 80203

April 24, 2020

The Honorable Ajit Pai  
Chairman - Federal Communications Commission  
445 12th Street S.W.  
Washington, DC 20554

Re: Rural Digital Opportunity Fund, WC Docket No. 19-126  
Transforming the 2.5 GHz Band - Rural Tribal Window WT Docket No. 18-120

Dear Chairman Pai:

The Colorado Broadband Office (CBO) writes to ask you to extend the October 22, 2020 opening of the Federal Communications Commission's (Commission's) Rural Digital Opportunity Fund 904 Auction (RDOF 904 Auction) and the Rural Tribal Window timeline, set to close on August 3, 2020, by 180 days respectively. The COVID-19 pandemic has demonstrated that the internet is critical infrastructure and having the ability to virtually conduct business, video conferences with medical professionals, and access online education has become essential for everyone, everywhere. Understanding that the COVID-19 pandemic has affected all aspects of our lives, our rural broadband providers and our tribal communities are exponentially impacted. Timelines considered reasonable pre-COVID-19 are simply unworkable as our rural communities attempt to respond to the pandemic.

The \$16.4 billion allocated by the FCC to the RDOF 904 Auction represents the single largest federal broadband funding opportunity for rural unserved communities over the next decade. It is imperative that a wide range of applicants have the ability to participate in the auction. The reality is that most providers are working to prioritize connectivity in their communities and simply don't have the resources to manage both preparing for the auction and serving their communities. If the deadline is not extended, it is likely that the most innovative internet service providers will not have the financial and technical resources to participate in the RDOF 904 Auction and an enormous opportunity will be lost for our most underserved rural communities.

Likewise, the 2.5 GHz spectrum opportunity and the associated Rural Tribal Window timeline should be extended to accommodate the realities of the impact of the COVID-19 pandemic on Tribal Nations.



The Nations' ability to focus on the vitally important 2.5 GHz spectrum opportunity has understandably been sidelined in order to address the immediate critical needs of health care, public safety, and unemployment as a result of the pandemic. Continuing with the preexisting Rural Tribal Window timeline will result in fewer applications and will effectively negate the Commission's laudable policy objective of establishing a priority window in the first place.

Each of these programs represents critical opportunities for our nation's least connected; however, the pandemic will not accommodate preexisting deadlines. Even under the best of circumstances, rural communities with fewer resources find it challenging to participate in federal broadband programs, and today we find ourselves in anything but the best of circumstances. We are living in a time many are referring to as the "Great Pause", a time when our nation, in solidarity, has withdrawn from customary business and social engagement for the health and safety of our nation. Lifesaving stay-at-home orders doubly impact rural areas lacking broadband access and stymie efforts to engage, train, and prepare the documentation necessary to participate in critical programs. In this spirit, we ask you to acknowledge these unprecedented times and grant a 6-month postponement for both of these critically important proceedings.

Please do not hesitate to contact me with any questions regarding this letter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Anthony Neal-Graves".

Anthony Neal-Graves  
Executive Director  
Colorado Broadband Office

